



## Department of Environmental Protection

7457/MBGC 39.01.00.0013 00604

Jeb Bush Governor

Twin Towers Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

May 22, 2000

Mr. David B. Twedell Vice President/Principal Scientist Nodarse & Associates, Inc. 1030 North Orlando Avenue, Suite A Winter Park, Florida 32789

RE: Addendum to the April 25, 2000 Comment Letter, Remedial Action Plan - Former Golf Course at Orlando Naval Training Center, Orlando, Orange County, Florida

Dear Mr. Twedell:

I have completed my review of the Addendum to the April 25, 2000 Comment Letter, Remedial Action Plan - Former Golf Course at Orlando Naval Training Center, dated May 5, 2000 (received May 9, 2000) and the Revised Drawing for the Remedial Action Plan dated May 12, 2000 (received May 15, 2000). The Remedial Action Plan is adequate for its intent. I have attached a certification of approval from Greg Brown, P.E.

So that I may arrange to visit the site during remedial action activities, please notify me two weeks prior to initiation of work at this site. If I can be of any further assistance with this matter, please contact me at (850)488-3693.

David P. Grabka

Remedial Project Manager

CC: Wayne Hansel, Navy SouthDiv
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge
Steve Tsangaris, CH2M Hill, Orlando
Bill Bostwick, FDEP Central District

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## Florida Department of **Environmental Protection**

TO:

David Grabka, Remedial Project Manager, Technical

Review Section

THROUGH:

Tim Bahr, P.G., Supervisor, Technical Review Section's

FROM:

Greg Brown, P.E., Professional Engineer II,

Technical Review Section

DATE:

May 12, 2000

SUBJECT:

Addendum to the April 25, 2000 Comment Letter, Remedial Action Plan, Former Golf Course Parcel Located at the Orlando Naval Training Center,

Orlando, Orange County, Florida.

I reviewed the Remedial Action Plan dated March 8, 2000 (received March 10, 2000), and provided you comments in a memorandum dated April 24, 2000. The subject Addendum contains clarifying responses to Department comments and complements the RAP. The RAP engineering document and subject Addendum are adequate for their intent. My engineering certification is attached.

Mr. Jay W. Casper, P.E., Florida licensed Professional Engineer No. 36330, is identified as the engineer of record for the Remedial Action Plan engineering document and Addendum. The RAP engineering document provides a limited but reasonable range of viable alternatives for remediation of arsenic contaminated soil. The preferred alternative is a combination of excavation and off-site disposal with on-site soil blending.

I have one comment for the record. In my comments on the RAP I noted that off-site disposal will generate approximately 40,000 vehicular miles. Using national average large truck fatal accident rates, I estimated that off-site disposal could potentially create a one in a thousand risk of a serious accident over the life of the project. The response to this comment was that transportation by truck is a requirement of Amendment No. 1 of the MOA between the City, Navy, and FDEP. This requirement should not prevent efforts by responsible persons to minimize the transportation risks associated with the hazards created by the project. Call me at (850) 488-3935 if you have questions.

Attachment

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



## Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

May 12, 2000

## CERTIFICATION OF APPROVAL

RE: Remedial Action Plan, Former Golf Course Parcel Located at the Orlando Naval Training Center, Orlando, Orange County, Florida, and Addendum to the April 25, 2000 Comment Letter.

Naval Training Center, Orlando, Florida, is undergoing investigation and remedial actions under the federal Comprehensive Environmental Response, Compensation, and Liability Act, as amended, administered by the U.S. Environmental Protection Agency Region 4 Administrator. In my professional judgment, the engineering features described in the engineering document, Remedial Action Plan, Former Golf Course Parcel Located at the Orlando Naval Training Center, Orlando, Orange County, Florida, and Addendum to the April 25, 2000 Comment Letter, dated March 8, 2000, and May 5, 2000, respectively, provide reasonable assurance of reducing applicable pollutants below quantities that may be potentially harmful or injurious to human health or welfare and animal or plant life in accordance with state requirements described by Chapter 376, F.S.

I have not evaluated and do not certify aspects of this plan that are outside the limits of my review responsibilities and outside my area of technical expertise (including but not limited to electrical, mechanical, and structural features). I personally conducted this review.

Gregory M. Brown, P.E.

Professional Engineer No. 42194

Expires February 28, 2001

Data

Enclosure (1)

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